UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

---x
                                                             :
TONY L. ANIRUDH, on behalf of himself and all   :   **ECF Case**
others similarly situated, and DIANNE C. ANIRUDH,   :
on behalf of herself and all others similarly situated,   :
                                                             :
                                    Plaintiffs,   :   No. 08 Civ. 03081 (WCC)
                                                             :
        v.   :
                                                             :
CITIMORTGAGE, INC.,   :
                                                             :
                                    Defendant.   :
                                                             :
---x

AFFIDAVIT OF LAWRENCE W. BAUMANN

        STATE OF MISSOURI   )
)SS.:
        COUNTY OF ST. CHARLES   )

Lawrence W. Baumann, being duly sworn, deposes and says that the following is true and

correct to the best of his knowledge, information and belief:

        1.   I am employed as Operations Support Manager by defendant CitiMortgage Inc.

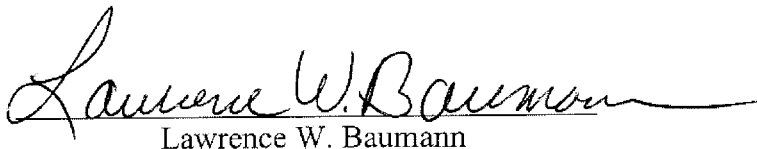("CMI"). CMI, an operating subsidiary of Citibank, N.A., is a mortgage lender.

        2.   Based on my employment experience, I am familiar with and have knowledge

about the computer records used by CMI for storing information about mortgage loans, and am

able to have information relating to CMI's mortgage loans generated and assessed from CMI's

computer systems, records, and archives.

        3.   CMI's computer records are capable of responding to queries designed to obtain

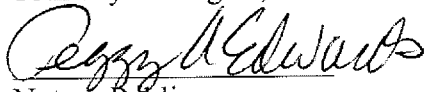particularized information about CMI transactions.

4.   On July 14, 2008, I caused CMI's computerized records to be queried to ascertain the total number of CMI co-ops that were paid off nationwide between March 26, 2002 and December 31, 2007 through a sale transaction or a refinance with another lender, and to determine the number of such co-op payoffs that were for payoff of New York co-op loans.

5.   This result of this query was that there were 14,998 such payoffs nationwide between March 26, 2002 and December 31, 2007, of which 14,509 were for payoff of New York co-op loans.

6.   According to CMI's records, therefore, approximately 96.7% of the payoffs described in Paragraph 4 above concerned New York co-op loans.

Lawrence W. Baumann

Sworn to before me this
18th day of August, 2008

Notary Public